

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking Regarding
Policies, Procedures and Rules for
Development of Distribution Resources Plans
Pursuant to Public Utilities Code Section 769.

Rulemaking 14-08-013
(Filed August 14, 2014)

And Related Matter.

Application 15-07-002
Application 15-07-003
Application 15-07-005
Application 15-07-006
Application 15-07-007
Application 15-07-008

**COMMENTS OF THE OFFICE OF RATEPAYER ADVOCATES
ON THE DISTRIBUTION RESOURCES PLAN (DRP)
ROADMAP STRAW PROPOSAL**

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I. INTRODUCTION

Pursuant to Administrative Law Judge (ALJ) Julie Fitch’s ruling on November 16, 2015 (Ruling),¹ the Office of Ratepayer Advocates (ORA) submits these comments on the Distributed Resources Plans Roadmap Straw Proposal (DRP Roadmap). ORA files these comments pursuant to its statutory mission to obtain the lowest possible utility rates consistent with reliable and safe service levels. These comments are timely filed in compliance with the Ruling’s November 20, 2015 deadline. The DRP Roadmap provides a suggested schedule of workshops, rulings, and decisions for the DRP proceeding starting from November 2015 and extending to “2018 and beyond.”²

Energy Division (ED) staff created a comprehensive roadmap which incorporates related proceedings such as the Integrated Distributed Energy Resources (IDER)³ and the Rule 21 Interconnection (Rule 21)⁴ proceedings. Prior to California Public Utilities Commission (CPUC) adoption of the DRP Roadmap through the DRP Scoping Memo, ORA recommends the following modifications:

- a. The DRP Roadmap should adopt the biennial process contemplated in the Final Guidance.⁵
- b. The DRP roadmap should contemplate the funding authorizations resulting from its decisions and properly identify portions of the proceeding as ratemaking or quasi-legislative.
- c. The DRP Roadmap should clarify the stakeholder involvement in the DRP process through opportunities to comment.

¹ Administrative Law Judge’s Ruling Inviting Comments on Roadmap Staff Proposal, Nov. 16, 2015.

² DRP Roadmap, pp. 9-16.

³ Rulemaking (R.) 14-10-003.

⁴ R.11-09-011.

⁵ Assigned Commissioner’s Ruling on Guidance for Public Utilities Code Section 769 — Distribution Resource Planning (Final Guidance), Feb. 6, 2015.

- d. Rulings are not the appropriate vehicles for the CPUC to adopt funding mechanisms for DRP implementation; therefore Rulings 2, 3 and 4 are properly considered before the Commission as an Interim Decision (ID) such as ORA's suggested ID1 (see attachment A).
- e. The DRP Roadmap should determine foundational issues not currently contemplated for early action in Ruling 1 such as:
 - What categories of investments qualify as grid modernization investments⁶ related to the DRP and what categories are part of the traditional distribution planning process authorized under the Smart Grid proceeding?
 - Which categories of grid modernization investments can be deferred by DER integration and which cannot?
 - What threshold criteria should trigger IOU consideration of DER alternatives, e.g., a minimum project cost or upgrade of specific types of equipment?
 - Who should own and/or control the DERs used for DRP upgrades?
 - Shall DERs be sourced by third parties (as proposed by the Final Guidance), through Investor-Owned Utility (IOU) Requests for Offers (RFOs) (as proposed by the IOU DRP Applications) or through some combination of both?
- f. The scope of the DRP should be clarified in light of the revised scope in the IDER proceeding:
 - The DRP Roadmap should be clarified based on ED staff comments during the DRP Roadmap workshop to state that the locational net benefit analysis (LNBA) will only apply to location-specific deferrals such as distribution grid upgrades while the IDER

⁶ “Grid modernization investments” refer to upgrades necessary to accommodate the two way flow of electricity on the distribution grid which results from DER integration.

cost allocation methodology will apply to DER sourcing of non-location-specific services such as energy, capacity, or ancillary services.

- The LBNA and the IDER cost-allocation methodologies should be integrated to allow DER to provide layered value during sourcing.
 - IDER sourcing pilots should remain separate from the DRP Demonstration projects for the sake of regulatory efficiency and the ability to properly assess the success of the demonstration projects without confounding variables.
- g. The DRP Roadmap should include metrics of success for the CPUC to evaluate each IOU demonstration project.
- h. The DRP Roadmap should address DRP integration with the CPUC general rate case (GRC) process at the same time it addresses DRP process alignment with the California Energy Commission (CEC) Integrated Energy Planning Report (IEPR), the California Independent System Operator (CAISO) Transmission Planning Process (TPP), and the CPUC Long-Term Procurement Planning (LTPP).
- i. The DRP Roadmap should contemplate the CPUC rulemaking required for the integration of CAISO DER market initiatives such as the Distributed Energy Resources Product (DERP) and the Energy Storage and Distributed Energy Resources (ESDER).

II. DISCUSSION

On November 2, 2015, ED issued its DRP Roadmap. On November 9, ED hosted a joint workshop on the DRP Roadmap for the stakeholders in the DRP and the IDER proceeding. The DRP roadmap is intended to serve as a framework for the DRP scoping memo by outlining the stakeholder process for evaluating the July 1, 2015 DRP applications filed by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), Golden State Water Company on Behalf of its Bear Valley Electric Service Division (Bear Valley), Liberty Utilities (CalPeco Electric) L.L.C. (Liberty Utilities) and PacifiCorp (collectively the “Consolidated Applications”). The DRP Roadmap focuses on the

approval and implementation of Demonstration Projects A through E as well as sourcing mechanisms for the DRP and the IDER. Issues not contemplated by the DRP Roadmap include (1) Bear Valley, Liberty Utility and PacifiCorp's (collectively the small and multi-jurisdictional utilities' (SMJUs') requests for proceeding bifurcation), and (2) ORA and The Utility Reform Network's (TURN) request to reclassify some or all of this proceeding as ratesetting, respectively.

A. The DRP Roadmap should adopt the biennial process proposed under the Final Guidance.

The DRP Roadmap should adopt the biennial cycle contemplated in the Final Guidance. According to the ALJ Ruling on the DRP Guidance,

one of the most important recommendations of this guidance document is for the Commission and IOUs to adopt a biennial DRP filing cycle as part of the ratification of the Utility DRP Applications. Each iteration of the process will move California further down a path toward deeper penetration of DER, more effective analysis of where DER provides the most value to customers and to the electric distribution system, and a greater understanding of the policy framework that is necessary to achieve these goals.⁷

The IOUs' DRPs lack consensus on the adoption of the biennial cycle, as PG&E requests no additional DRP filings with all DRP-related planning incorporated into PG&E's annual Distribution Planning Process (DPP),⁸ while SCE contemplates filing a biennial DRP filing which eventually gets incorporated into the GRC,⁹ and SDG&E adopts a biennial cycle.¹⁰

⁷ Final Guidance, pp. 4-5.

⁸ PG&E DRP, p. 209.

⁹ SCE DRP, p. 243.

¹⁰ SDG&E DRP, p.10, (SDG&E suggests that implementing a biennial DRP Status Report will be an effective means of providing the status of DER development, while updates to the DRP itself can be made on a biennial cycle if necessary to incorporate revisions to methodologies or consideration of emerging DER technologies that were not contemplated in the initial DRP.)

Currently the DRP Roadmap is divided into four phases (phases 1 to 4), with no portion identified as recurring or iterative within a 2-year timeframe. According to the Final Guidance,

[t]he DRP filing was not intended to be a ‘one and done’ exercise and most parties have expressed the notion that the DRP or a successor document would become a regular filing. Therefore, the presumed activities in 2017 and 2018 shown below do not make any assumption that there would be a new or updated filing.¹¹

The DRP Roadmap contemplates consideration of additional DRP filings to be addressed in Decision D1, not scheduled until December 2016. By then, however, the proceeding will be set along a path that will make it difficult to incorporate a biennial cycle.

The current DRP Roadmap framework is generally consistent with the Final Guidance but its hesitation to recommend a biennial cycle is likely a product of its focus on demonstration project implementation. Arguably, the demonstration projects are a one and done activity, although adoption of biennial updates would give the CPUC more latitude to tackle aspects of demonstration projects on a staggered basis. Other one-and-done activities include barriers to deployment, a recounting of safety and reliability protocols,¹² and listing applicable tariffs and incentives for DER.

ORA recommends the Commission adopt a biennial DRP cycle for (1) grid modernization investments in order to inform the GRC, and (2) DER growth scenario updates to inform the CEC IEPR, the CPUC LTPP, and the CAISO TPP. The latter update is particularly important to implement on a biennial cycle in order to synchronize the DRP proceeding with the LTPP, TPP, and IEPR. Determination of the DRP as a biennial cycle is a threshold issue that should be decided sooner than later, if not in the

¹¹ DRP Roadmap, p. 15.

¹² Subject to significant revisions to the safety and reliability codes.

scoping memo. The need for DRP coordination is illustrated by PG&E's DRP, where the IEPR forecast for photovoltaics (PV) and electric vehicle (EV) adoption rates varied significantly from the rate seen on PG&E's system. Accurate forecasts of DER adoption rates should be integrated into the IEPR, TPP, and LTPP with predictable frequency.

B. Funding authorizations should be clearly identified and considered as a rate setting.

Public Utilities (P.U.) Code section 769 anticipates that DRP-related grid modernization investments will be authorized under the DRP, just as smart grid investments were authorized under the Smart Grid proceeding. Additionally, spending authorizations resulting from the approval of demonstration plan implementation are necessary to comply with the Final Guidance requirements. The ALJ Ruling highlights the role of funding authorizations in the DRP proceeding, stating “[n]otably, the Commission is authorized to modify and approve a Utility’s DRP ‘as appropriate to minimize overall system costs and maximize ratepayer benefit from investments in distributed resources.’”¹³

Since funding authorizations are contemplated in the DRP proceeding, ORA recommends the DRP Roadmap categorize portions of the proceeding necessitating cost authorization as a ratesetting proceeding and set them on a separate track or phase. The ratesetting categorization is necessary to set a budget for the projects and a budget is necessary to “right-size” the projects and apportion ratepayer funding equitably among the IOUs. Categorization as ratesetting is also needed to approve grid modernization funding for expenses not approved through the Smart Grid proceeding. The GRC is a cost recovery mechanism that ensures recovery for expenses already approved for GRC cost recovery. No approval has been granted for grid modernization expenses to integrate DERs under the DRP even though grid modernization is a parallel goal of the DRP.¹⁴

¹³ Final Guidance, p. 2.

¹⁴ “DRPs should also reflect these parallel goals: 1) to modernize the electric distribution system to

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Funding authorization under a quasi-legislative proceeding would deny the CPUC the opportunity to review the costs for reasonableness and is therefore counter to P.U. Code Section 769's authorization "to minimize overall system costs and maximize ratepayer benefit." For this reason, the proceeding was initially categorized as a ratesetting, and portions of the proceeding authorizing cost recovery should be categorized as ratesetting again. For more information, see our discussion on the need for a ratesetting categorization in ORA's protest to the Consolidated Applications.¹⁵

C. The DRP Roadmap should identify opportunities for stakeholder comment.

The DRP Roadmap should clarify opportunities for stakeholder feedback such as comments on a workshop report. The current DRP Roadmap uses ambiguous language regarding the potential for comments. When discussing the data access workshop, the DRP Roadmap states that "[t]his workshop could lead to a workshop report with stakeholder comments."¹⁶ In another example, the DRP Roadmap discussion for Workshop 3 (W3) on DER growth scenarios states that the "workshop may review whether and how to . . . provide opportunity for stakeholder comment (if appropriate and feasible)"¹⁷ ORA acknowledges that the rest of the DRP Roadmap is also couched in the same type of ambiguous language. However, other aspects of the DRP Roadmap are also calendared on the Gantt chart,¹⁸ suggesting their implementation is firmly envisioned while opportunity to comment is not calendared. Additionally, the timing of the workshops, some scheduled just one month prior to a ruling on the same matter,

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accommodate two-way flows of energy and energy services throughout the IOUs' networks;" Final Guidance, p. 3.

¹⁵ Protest of the Office of Ratepayer Advocates, Aug. 31, 2015, pp. 27-32.

¹⁶ DRP Roadmap, p. 10.

¹⁷ DRP Roadmap, p. 11.

¹⁸ DRP Roadmap, pp. 7-8.

suggests no meaningful opportunity to comment on certain workshops. Finally, a series of DRP workshops scheduled in the Spring of 2015 in anticipation of the DRP Applications did not provide an opportunity for written comments, suggesting that some DRP Roadmap workshops may also lack the opportunity for written comments.

ORA recommends that the DRP Roadmap clarify opportunities for stakeholder comments and adopt the workshop report structure adopted in Attachment A. In the DRP roadmap workshop, ED staff expressed a desire to build a robust record upon which to conduct decision-making. Allowing stakeholder written comments is necessary to create this robust record. Stakeholder engagement may waver if stakeholders are not allowed to prepare written comments, resulting in a record limited to the most vocal participants in each stakeholder workshop. This may unduly limit stakeholder engagement. Our attached DRP Roadmap states that written comments will be allowed and suggests consolidated comments in certain cases for efficiency. Having an opportunity for written comments allows stakeholder to plan ahead and adjusts the expectations for stakeholder input.

D. Funding authorizations are properly considered before the Commission as a Decision or Interim Decision.

The DRP Roadmap proposes up to four rulings (R1 through R4) prior to the proposed decision in October 2016.¹⁹ To the extent that these rulings authorize cost recovery or an advice letter process to create a memorandum account for cost recovery, full Commission approval would be required.²⁰ It would also be improper to approve cost allocation through a ruling. ORA understands that R1, as currently contemplated,

¹⁹ DRP Roadmap, p. 7.

²⁰ General Order 96-B, General Rules section 5.1(1) provides that:

A utility may also request relief by means of an advice letter where the utility: (1) has been authorized or required, by statute, by this General Order, or by other Commission order, to seek the requested relief by means of an advice letter.

Pursuant to this provision; a statute, General Order 96-B or a Commission order would be required to

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does not authorize funding. However, ORA recommends that funding and cost allocation authorizations in R2 through R4 should be issued as an interim decision, to be deliberated and decided by the full Commission, as suggested in Attachment A.

E. Proposed Ruling 1 (R1) should resolve foundational DRP issues not currently contemplated under the staff proposal.

The DRP roadmap currently envisions a ruling (R1) in January 2016 with the primary purpose of provisionally approving the integrated capacity analysis (ICA) methodology and authorizing demonstration project A.²¹ At the DRP Roadmap workshop, many parties expressed concern that the DRP Roadmap was overly focused on the demonstration projects. ORA agrees that additional issues need to be scoped in for early action in the DRP proceeding. Therefore, ORA recommends the Commission resolve the following threshold issues in Ruling 1:

- Which categories of grid upgrades qualify as grid modernization investments related to the DRP, as opposed to upgrades proposed as part of the traditional distribution planning process?

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authorize a Memorandum Account through the advice letter process. An ALJ Ruling does not provide the proper authorization. An ALJ Ruling cannot independently authorize cost recovery or authorize an advice letter process to establish a Memorandum Account for cost recovery.

Similarly, General Order 96-B and Energy Rules section 5.1(1) also require more than an ALJ Ruling to establish a Memorandum Account. According to Energy Rules section 5.1(1), a Memorandum Account would be appropriately “designated by a Utility in its [Tier 1] advice letter as effective pending disposition,” if:

- (1) A tariff change [is] in compliance with specific requirements of a statute or Commission order where the wording of the change follows directly from the statute or Commission order.

Accordingly, an ALJ Ruling that authorizes cost recovery, or authorizes an advice letter process to establish a Memorandum Account for cost recovery, is legally inconsistent with General Order 96-B, General Rules sections 5.1(1) and Energy Rules section 5.1(1). Those regulatory provisions require that a Commission Decision voted out by the Commission authorize cost recovery through a Memorandum Account, unless otherwise authorized by statute or General Order 96-B.

²¹ DRP Roadmap, pp. 9-10.

- Which categories of grid modernization investments can be deferred by DER integration and which cannot?
- What threshold criteria should trigger IOU consideration of Distributed Energy Resources (DER) alternatives? Is the threshold a monetary limit or a certain category of upgrade, or a combination of both?
- Who should own and/or control the DERs used for DRP upgrades?
- Shall DERs be sourced by third parties through a process developed by stakeholders (as proposed by the Final Guidance) or through Investor-Owned Utility (IOU) Requests for Offers (RFOs) (as proposed by the IOU DRP Applications)?

F. The role of the IDER cost effectiveness framework and the DRP LBNA should be clarified.

The interweaving of valuation methodologies from disparate origins should be reconciled to streamline both the IDER and the DRP proceedings. The DRP Roadmap states that joint IDER/DRP workshops are envisioned to discuss the DRP LBNA methodology and the IDER cost-effectiveness framework. During the DRP Roadmap workshop (Joint Workshop (JW)1) held on November 9, 2015, ED staff indicated their intention for the LNBA methodology to inform location-specific²² valuation such as distribution upgrade deferral in the DRP, while the IDER methodology was applicable to non-location-specific DER sourcing such as procurement for energy, capacity (including local capacity), and ancillary services. This clarification should also be explicit in the DRP Roadmap, which is currently vague on the topic. For example, the DRP Roadmap states that the “IDER may also potentially consider the issue of location-specific or service-specific pricing and how the LNBA and ICA results to other methods may be used in determining such pricing, as suggested by a number of parties.”²³

²² ED staff indicated that location-specific procurement meant that the sourcing could be identified to DER integration at a specific feeder.

²³ DRP Roadmap, pp. 5-6.

Specifying the purpose of each valuation methodology is important to properly scope the demonstration projects. For example, SCE's preferred resources pilot was originally intended to procure 50 MW of local energy and capacity.²⁴ If the LBNA methodology is not intended to value the energy and capacity value of DER integration, SCE should propose a specific feeder-level distribution upgrade deferral to be valued using the LNBA regardless of whether it is in the preferred resources pilot area.

G. The IDER and DRP DER valuation should be integrated but not necessarily executed in the same demonstration project.

As discussed above, ED staff stated unique objectives of the IDER cost-effectiveness framework and the DRP LNBA, yet the DRP Roadmap suggests that both methodologies may be incorporated into the demonstration projects C through E. If possible, it would be simpler to use one valuation methodology rather than two, and adapt the valuation to include added location-specific values.

If the Commission decides to use both valuation methodologies, the LBNA and the IDER cost-effectiveness framework should be integrated to allow DER to provide layered value. However, this exercise will take time and resources.

ORA is concerned that incorporating the IDER sourcing mechanism into the DRP demonstration projects will unduly delay implementation of the DRP demonstration projects and obscure the Commission's ability to evaluate the success of each portion of the demonstration project. At the DRP Roadmap workshop, ED staff indicated that the schedule for the DRP LBNA analysis is delayed to accommodate development of the IDER cost-effectiveness framework.

²⁴ "Our Preferred Resources Pilot" webpage, www.sce.com. ("Our pilot takes place in central Orange County, near the San Onofre Nuclear Generating Station (SONGS). Now that the plant is no longer producing electricity, and with other ocean-cooled power plants scheduled for closure in 2020, we need to ensure electricity reliability remains at dependable levels.")

For the sake of regulatory efficiency and the ability to properly assess the success of the demonstration projects without confounding variables, ORA recommends that pilots related to the sourcing of DER using the IDER cost-effectiveness framework pilots remain separate in this initial iteration of the DRP biennial cycle.

H. Demonstration projects should be evaluated on metrics of success.

Neither the Final Guidance nor the DRP Roadmap includes metrics of success for the demonstration project. In order to inform the DRP Scoping, the DRP Roadmap should incorporate metrics for success for each demonstration projects such as the ones suggested below:

- Did the demonstration project create reliability concerns?
- Was the project cost-effective for ratepayers?
- Did the LNBA methodology accurately predict DER value?
- Did the DER integrate in a timely fashion or did the capacity change so much by the time the project was implemented that it rendered the DER integration meaningless?
- Did the demonstration project reduce greenhouse gas emissions on the distribution grid?
- Is this project scalable?
- Does this project integrate well with the IOUs' existing transmission and distribution systems?

ORA does not expect that demonstration projects will meet all the criteria but the Commission should evaluate the ultimate “success” of the demonstration projects by evaluating criteria such as these.

I. Coordination with the General Rate Case (GRC) should occur earlier in the DRP process.

Coordination with the GRC should occur as an early action with a resolution under R1 of the DRP Roadmap, as envisioned in ORA's revised DRP Roadmap, see

Attachment A. ORA staff reviewing distribution system upgrades identified DRP-related expenditures in the 2017 GRC PG&E filed on September 1, 2015.²⁵ According to TURN, PG&E's 2017 GRC contemplates approximately \$200 million (M) of grid modernization upgrades related to DER integration.²⁶ As such, the test for DRP integration in the GRC is occurring now and not in SCE's next GRC application, to be filed in 2016.

J. The DRP roadmap should contemplate rulemaking necessitated by the integration of CAISO DER market initiatives such as the Distributed Energy Resource Product (DERP) and Energy Storage and Distributed Energy Resources (ESDER) initiatives.

The DRP Roadmap should scope in a joint DRP/IDER/DERP/ESDER workshop to address consumer protection and DER integration concerns related to the CAISO DERP and ESDER initiatives. The DERP is an aggregated product for DER aggregated to a 0.5 MW minimum bid, but excludes Proxy Demand Response (PDR) and Reliability Demand Response Resource (RDRR) products.²⁷ The ESDER is a DER product specifically for demand response (DR) and energy storage (ES) market products, which can bid into the CAISO market as a PDR or RDRR product. Unlike the DERP, the ESDER allows third party aggregators to aggregate PDR and RDRR as one market product, but also allows individual DR and ES to bid in as PDR or RDRR.

²⁵ A.15-09-001, PG&E 2017 General Rate Case, Prepared Testimony, Sep. 1, 2015, Exhibit PG&E-4, Chapter 13, (PG&E requests \$183 million in capital expenditures in 2017-2019 for two DRP-related programs: Volt/VAR Optimization Program (VVO) and DER Integration Capacity Program. ORA's GRC review is ongoing and additional DRP related expenditures may exist.)

²⁶ TURN GRC Protest to PG&E 2017 GRC (A.15-07-006), pp. 11-12, (PG&E is requesting authorization for at least \$200 million in capital spending to implement its Distribution Resources Plan ("DRP"), submitted by PG&E on July 1, 2015 in Application (A.)15-07-006.)

²⁷ The PDR and RDRR are both advanced demand response products which value customer load reduction as a product of either energy curtailment or behind-the meter generation through energy storage or traditional generation.

The DRP Roadmap should include a joint workshop on DERP and ESDER integration with the DRP, IDER, and the CAISO stakeholders. Ratepayer protection concerns arising from potential manipulation of ratepayer DER owners by third-party DER aggregators is properly scoped into the IDER, which considers DER sourcing. The DRP is also properly included in the joint workshop because DER sourcing for distribution deferrals can include third-party aggregated DER resources, whose inclusion implicates the same consumer-protection considerations.

III. CONCLUSION

ORA respectfully submits these comments and recommends that the CPUC adopt ORA's recommendations.

Respectfully submitted,

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ATTACHMENT A

ORA Proposed 2015-2016 Distribution Resources Plan (DRP) Cycle

| Date | Workshops | Decision/Ruling | | |
|--|---|--|--|--|
| Nov-15 | JW1 DRP Roadmap (11/9) JW1 Comments (11/20) W1 Integration Capacity Analysis (ICA) and Demo A (11/10) W1 Report and Comments | — | | |
| Dec-15 | W2 General Rate Case (GRC) Alignment/Grid Modernization Investments W3 Distributed Energy Resources (DER) Ownership and Control W2-3 Workshop Report & Comments | Scoping Memo for the 2015-2016 Biennial DRP Cycle (note a) | | |
| Jan-16 | JW2 LNBA and Demo B JW2 Report and Comments | — | | |
| Feb-16 | W4 DER Growth Scenarios W5 DRP Process Alignment with the LTTP, TPP and the IEPR W4-5 Workshop Report & Comments | Ruling 1 (note b) | | |
| Mar-16 | JW3 Integration of iDER cost allocation methodology with the LNBA/ look at effects of ICA on both iDER cost allocation and LNBA JW3 Report and Comments | — | | |
| Apr-16 | W6-7 Demonstration Projects C, D, E (note c) W6-7 Report & Comments | * Potential Interim PD/D (note d) | | |
| May-16 | JW4 DER Sourcing W8 Data Access JW4,W8 Report and Comments Start Data Access Working Group | — | | |
| Jun-16 | — | — | | |
| Jul-16 | — | — | | |
| Aug-16 | — | — | | |
| Sep-16 | JW5 Smart Inverter Working Group (SIWG) JW6 Rule 21 Interconnection | — | | |
| Oct-16 | JW7 Storage JW8 Electric Vehicles (EV) | PD (note e) | | |
| Nov-16 | JW9 Zero net Energy Buildings (ZNE) JW10 CAISO ESDER/DERP integration | — | | |
| Dec-16 | JW5-10 Report and Comments | D (note e) | | |
| Key: | | | | |
| W- Workshop | | | | |
| R - Ruling | | | | |
| JW - Joint workshop | | | | |
| PD - Proposed Decision | | | | |
| D - Decision | | | | |
| <i>"Italics text"</i> - Indicates that the proposal is not included in the ED Staff proposal) | | | | |
| Notes: | | | | |
| (a) Scoping Memo (December 2015) - Clarify scope of iDER and DRP. DRP just for distribution upgrades; the iDER for DER integration for energy, capacity and ancillary services. <u>ORA Recommended Scope of Issues for the 2015-2016 DRP</u> - What categories are grid upgrades for the DRP and what are part of the traditional distribution planning process. - What should the threshold criteria for DER deferral for traditional distribution upgrades be. - Who should own and/or control the DERs used for DRP upgrades. - How will the DRP be incorporated into the CPUC LTTP, CPUC GRC, the CAISO TPP and CEC IEPR process. - What are the metrics of success for each of the demonstration projects. | | | | |
| (b) Ruling 1 (February 2016) - Definition of categories for grid modernization investments for DRP and traditional distribution planning. - Definition of what will be considered for DER deferral - thresholds for cost (e.g. >\$1M) or type of investment (substation upgrade). - Determination made on extent of DER ownership and control. - Provisional approval of ICA and Demonstration Project A with no allowance for additional cost recovery. - Metrics for demonstration project A success and criteria for updates. - Discussion of how IOUs will account for failure to meet deadlines for the ICA. | | | | |
| (c) Includes detailed proposals of deferred distribution upgrade meeting Ruling 1 criteria. | | | | |
| (d) Potential Interim PD (replaces R2, R3 in ED Staff proposal) (April 2016) - Authorizing LNBA methodology if iDER cost allocation methodology can be integrated into a layered-value proposition. Potentially authorizing Demonstration B with cost caps. - Authorizing DER Growth Scenario analysis. | | | | |
| (e) PD (October 2016) / D (December 2016) - Clarified project requirements for Demonstrations C, D, and E based on definition of DRP-related projects and threshold criteria for DRP Investment deferral in Ruling 1. - Determination of cost caps and metrics of success for Projects C, D, and E. IOUs to file detailed scoping memos for Demo Project C,D, and E Implementation according to Final Guidance Schedule, or other appropriate funding source. - Direction for IOUs to submit demo projects for alternate funding sources such as DOE or EPIC funding for Request for Proposal RFP-15-314 - Research Roadmap for Integrating High-Penetrations of Renewable and Distributed Energy Resources. | | | | |